

ATTACHMENT II-4

PERSONNEL TRAINING PLAN

1. Overview and General Requirements.
  - a. This plan addresses the training requirements for hazardous waste management activities at the facility including storage, treatment, and disposal.
  - b. Personnel training at the facility is accomplished through five training programs:
    - i. Facility (Introductory) Orientation Training
    - ii. On-The-Job Training
    - iii. Initial Classroom Training
    - iv. Annual Review Training
    - v. Annual Response Training Drill
  - c. This plan describes the training requirements for each of these five training programs including the program content, frequency, and personnel applicability.
  - d. All training programs involve training on the implementation of Attachment II-6, *Contingency Plan*.
  - e. Training required by this plan shall be documented in the operating record. Records of successful or unsuccessful completion of these training programs shall be kept at the site until closure of the facility or for three years from the date the facility worker or supervisor last worked at the site whichever comes earlier.
  - f. Other associated documents regarding training, such as attendance rosters, tests, test scores, additional training, etc., are not required to be kept as part of this permit but may be kept in accordance with Permittee policy.
  - g. The Permittee shall maintain the following documents and records at the facility:
    - i. the job title for each position of facility supervisor and worker
    - ii. the name of the individual filling the positions in 1.g.i, above

- iii. a written job description for each position in 1.g.i, above, which shall include the requisite skill, education, or other qualifications, and duties of the position.
2. Personnel Categories. For purposes of this training plan, the following categories of personnel are defined:
- a. Facility worker. A facility worker is an individual who directly handles hazardous waste and is directly involved in hazardous waste management. Facility workers include those who:
    - i. sample incoming hazardous waste shipments
    - ii. analyze hazardous waste samples
    - iii. unload or transfer hazardous waste to or from containers, tanks, storage, treatment or disposal
    - iv. are involved in handling hazardous waste in treatment, encapsulation, or disposal activities, including surveying and placement of waste
    - v. conduct required inspections
    - vi. are involved in decontamination activities
    - vii. operate the thermal desorption system
  - b. Facility supervisor. A facility supervisor is an individual who reports to work at the site and who supervises facility workers.
  - c. Individuals who are not involved in handling hazardous waste are not required to complete the training outlined in this plan. These individuals may enter secured areas occasionally or for routine review, orientation, support, or guidance purposes. The following are examples of such individuals:
    - i. corporate executive officer
    - ii. executive assistants, officers and managers
    - iii. engineers-not directly involved in waste management
    - iv. accountants
    - v. secretaries, receptionists, etc.
    - vi. marketing personnel
    - vii. visitors and auditors
  - d. When such individuals visit the site, these personnel shall not be involved in the handling of hazardous waste unless they have completed the training outlined in this plan.

3. Facility Orientation Training

- a. A two-hour facility orientation shall be given to facility workers and supervisors before they begin working with hazardous waste.
- b. This orientation shall be provided by a facility supervisor or a designee trained in hazardous waste management.
- c. The Facility Orientation Training (or Introductory Orientation Training) shall include the topics listed in Table II-4-1.

4. On-The-Job Training

- a. Facility workers shall be supervised until the Initial Classroom Training is completed.
- b. During this period of time, a facility supervisor shall provide on-the-job training by providing directions, instructions, and work experiences to help the facility worker learn compliant safety, environmental protection, and waste management practices related to the facility worker's duties.
- c. Training topics in Table II-4-1 that are provided to a facility worker prior to completing the Initial Classroom Training shall be documented in the operating record as on-the-job training.
- d. On-the-job training is not required for facility supervisors or for workers who complete the Initial Classroom Training prior to being assigned hazardous waste handling duties.

5. Initial Classroom Training

- a. The Permittee shall provide a ten hour Initial Classroom Training to facility workers within six months of the date that they are hired to begin working in hazardous waste management positions unless their employment terminates or they are reassigned to a non-hazardous waste management position.
- b. For individuals who are to be facility supervisors, the Permittee shall provide a ten hour Initial Classroom Training before such individuals may act as facility supervisors.

- c. The Initial Classroom Training shall include the topics listed in Table II-4-1.
  - d. A multiple choice, true-false, and short-answer examination shall be given at the conclusion of the Initial Classroom Training. Successful completion of the examination shall demonstrate that the individual has been successfully trained. Individuals who do not pass the examination shall review applicable topics with the training director or designee. Those individuals shall retake the examination and receive applicable topical reviews until the individual satisfactorily passes the examination or the training director or designee determines that the training has been successfully completed. Alternatively, such individuals may be assigned to non-mixed-waste facility worker positions.
  - e. The Permittee may use off-site contractors to provide RCRA facility training. Up to seven hours of off-site contractor-provided training may be counted toward the ten hour Initial Classroom Training.
  - f. Up to seven hours of applicable training may be credited toward the ten hour Initial Classroom Training for individuals who meet the following requirements:
    - i. they worked at a permitted hazardous waste treatment, storage, or disposal facility for a period of two years, and
    - ii. their experience at that facility was within the last two years
6. Annual Review Training
- a. On an annual basis, following completion of Initial Classroom Training, facility personnel who handle hazardous waste shall receive Annual Review Training.
  - b. Annual Review Training shall be provided prior to the end of the month following the anniversary of completion of either the Initial Classroom Training or a previous Annual Review Training.
  - c. Annual Review Training shall include a 4-hour review of the items listed in Table II-4-1.
  - d. Annual review training may be provided in segments. Annual Review Training shall include classroom training on each of the topics in Table II-4-1.
7. Annual Response Training Drill

- a. Each calendar year, an Annual Response Training Drill shall be conducted which involves implementation of the *Contingency Plan*, Attachment II-6.
  - b. This drill may be unannounced and shall be a "fire-drill"-type contingency exercise with the following agenda:
    - i. announcement of contingency
    - ii. implementation of the Contingency Plan
    - iii. response to incident
    - iv. resumption of normal operations
    - v. written evaluation of response
8. Initial Classroom Training Direction
- a. The Initial Classroom Training shall be directed by an employee who has had at least one year's experience at the Permittee's Mixed Waste Facility.
  - b. The training director shall ensure that all items of training outlined in Table II-4-1 are covered.
9. Supervision.
- a. Facility personnel shall work under supervision until completion of the Initial Classroom Training.
  - b. For purposes of this plan, working under supervision includes having work tracked or reviewed by an immediate or other supervisor.
  - c. Supervision does not mean that the employee will never leave sight of the assigned overseer, but it does mean that the individual shall not be assigned to complete hazardous waste management tasks without guidance or assistance from supervisors.
10. Temporary and Contractor Employees
- a. Personnel working in hazardous waste management positions under contract for the Permittee or as temporary employees are subject to the same requirements as other personnel in this plan.
11. Transfers Between Categories

- a. If a facility worker is promoted to a facility supervisor position, the Facility Orientation Training originally received need not be repeated. However, the Initial Classroom Training shall still be provided within six months from the time that the individual began working as a facility worker.

12. Classroom Training Requirements for Periodic Employees

- a. If a facility worker or supervisor terminates employment or is transferred to a non-hazardous-waste-handling position and then returns without having kept current on training, the following apply:
  - i. Facility Orientation Training remains in effect for employees who do not terminate employment and for three months following termination.
  - ii. Initial Classroom Training remains in effect for two years from completion.
  - iii. Annual Review Training remains in effect for one year from completion.

13. Training Requirements for Qualified Thermal Desorption (TD) Operators

- a. TD Operator training shall be directed by recognized consultants and/or in-house specialists for the specific concepts being taught.
- b. TD Operator training shall consist of the following courses (in addition to the facility orientation and initial classroom training):
  - i. introductory operation of the TD system
  - ii. TD system emergency response
  - iii. TD system on-the-job training
- c. On-the-job training shall be conducted over a four week time frame:
  - i. week one = observation of the TD system operation under the direction of an employee designated lead plant operator, or higher.
  - ii. week two = hands on operation under the direct supervision of an employee designated lead plant operator, or higher.

- iii. weeks three and four = operating the system within the presence of an employee designated lead plant operator, or higher.
- d. TD Operator training may be accelerated based upon prior experience and history of the trainee
- e. Upon completing on-the-job training, the employee shall be designated a qualified TD operator.

TABLE II-4-1  
TRAINING TOPICS

**General Orientation:**

- Company Policies
- Eating, Smoking, Chewing
- Rest Room Areas
- Site Layout
- Site Security

**Contingency Plan:**

- Implementation
- Internal Communications/Alarms
- Portable Fire Extinguishers
- Use of Telephone
- Location of Emergency Equipment
- Decontamination Equipment
- Spill Control
- Site Evacuation Procedure

**Personal Safety Guidelines:**

- Exposure Routes
- Standard Personal Safety Equipment

**Preparedness and Prevention:**

- Precautions for Ignition/Reaction
- Prevention
- Sparks or Sources of Ignition

**Statutes, Laws, Regulations:**

- Definition of Hazardous Waste
- Manifest System

**Incoming Shipment Procedures:**

- Approval of Incoming Shipments
- Manifest Systems

**Storage/Treatment/Landfill**

**Management:**

- Free Liquids
- Housekeeping
- Storage Area Operation
- Unloading and Washdown
- Landfill Operation
- Care in handling waste
- Safety Precautions - Unloading and Storage
- Evaporation Tank Operation
- Interim Infiltration Barrier
- Operation and Inspections  
(only if currently in operation)

**Treatment Facility:**

- Macroencapsulation
- Treatment Formula Development
- Receiver Tank Operation
- Mixer Tank Operation
- Grizzly/Screens Operation
- Shredder/Crusher Operation
- Material/Reagent Handling
- HVAC System Operation
- Thermal Desorption Operation
- Mercury Mixer

**Management of Waste Containing  
Polychlorinated Biphenyls (PCBs):**

- Identification
- Characterization
- Acceptance
- Storage Requirements
- Decontamination
- Wind Dispersal Control
- Disposal Requirements